

**Exhibit A**

**Proposed Order**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the  
Commonwealth.

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ORDER GRANTING THREE HUNDRED NINETY-SIXTH OMNIBUS OBJECTION (NON-  
SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO TO  
SUBSEQUENTLY AMENDED CLAIMS

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Upon the *Three Hundred Ninety-Sixth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Subsequently Amended Claims* [ECF No. 18960] (the “Three Hundred Ninety-Sixth Omnibus Objection”),<sup>2</sup> filed by the Commonwealth of Puerto Rico (“Commonwealth”), dated October 29, 2021, for entry of an order disallowing in their entirety certain claims filed against the Commonwealth, as more fully set forth in the Three Hundred

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Three Hundred Ninety-Sixth Omnibus Objection.

Ninety-Sixth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Three Hundred Ninety-Sixth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Three Hundred Ninety-Sixth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Three Hundred Ninety-Sixth Omnibus Objection (collectively, the “Claims to Be Disallowed”) having been amended and superseded by the subsequently filed proofs of claim identified in the column titled “Remaining Claims” in Exhibit A (collectively, the “Remaining Amended Claims”); and the Court having determined that the relief sought in the Three Hundred Ninety-Sixth Omnibus Objection is in the best interests of the Commonwealth, its creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Three Hundred Ninety-Sixth Omnibus Objection establish just cause for the relief granted herein; and the Court having deemed a hearing is not necessary as no objection, responsive pleading, or request for a hearing with respect to the Three Hundred Ninety-Sixth Omnibus Objection has been submitted, and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Three Hundred Ninety-Sixth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that the Commonwealth’s right to object to the Remaining Amended Claims on any grounds whatsoever is reserved; and it is further

ORDERED that Kroll is authorized and directed to designate as expunged the Claims to Be Disallowed from the official claims register in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 18960 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: \_\_\_\_\_

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Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to Three Hundred Ninety-Sixth Omnibus Objection**

Three Hundred and Ninety-Sixth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

CLAIMS TO BE DISALLOWED

REMAINING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT		NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
1	ALVAREZ SANTIAGO, ELSIE S. HC 2 BOX 22601 CABO ROJO, PR 00623- 9274	07/27/20	17 BK 03283-LTS / Commonwealth of Puerto Rico	174305	Undetermined*		ALVAREZ SANGIAGO, ELSIE SOCORRO HC 2 BOX 22601 CABO ROJO, PR 00623- 9274	09/07/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179565	\$ 30,000.00
	Reason: Amended and superseded by a later filed Proof of Claim.										
2	GENESIS SECURITY SERVICES, INC LUIS L TORRES- MARRERO PO BOX 195075 SAN JUAN, PR 00919-5075	06/29/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	129777	\$ 12,384,427.39*		GENESIS SECURITY SERVICES, INC. LUIS L. TORRES- MARRERO P. O. BOX 195075 SAN JUAN, PR 00919-5075	09/27/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179621	\$ 10,543,240.30
	Reason: Amended and superseded by a later filed Proof of Claim.										
3	ORTIZ ROBLEDO, BRUNILDA URB CAPARRA TERRACE, 1126 CALLE 30 SE SAN JUAN, PR 00921-2218	06/29/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	82115	\$ 15,600.00		ORTIZ ROBLEDO, BRUNILDA URB. CAPARRA TERRACE 1126 - 30 SE SAN JUAN, PR 00921-2218	09/05/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179566	\$ 15,600.00
	Reason: Amended and superseded by a later filed Proof of Claim.										
4	SUCESION PASTOR MANDY MERCADO MARÍA E. VICÉNS RIVERA 1218 AVE HOSTOS STE 117 PONCE, PR 00717-0944	04/19/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	6272	\$ 30,000,000.00*		THE ESTATE OF PASTOR MANDRY MERCADO CHARLES A. CUPRILL, ESQ. CALLE FORTALEZA356 SAN JUAN, PR 00901-1717	08/31/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179550	\$ 30,496,000.00*
	Reason: Amended and superseded by a later filed Proof of Claim.										